

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

UNITED STATES OF AMERICA)	
vs.)	CASE NUMBER:1:18CR029
PAUL WILSON AISOSA)	

MOTION FOR EVIDENCE OF CONSIDERATION TO WITNESSES

COMES NOW the Defendant, in accordance with the principles of Brady v. Maryland, 373 U.S. 83 (1963), Giles v. Maryland, 386 U.S. 66 (1967), and Giglio v. United States, 405 U.S. 150 (1972), and moves this Court for entry of an order directing the government to make inquiry and disclose all of the following within its possession, custody or control, or the existence of which is known or by the exercise of due diligence could become known to the government:

(1)

Any and all consideration or promises of consideration given to or on behalf of the witness or expected or hoped for by the witness. By "consideration" the Defendant refers to absolutely anything, whether bargained for or not, which arguably could be of value or use to a witness or to persons of concern to the witness, including but not limited to formal or informal, direct or indirect; leniency, favorable treatment or recommendations or

other assistance with respect to any pending or potential criminal, parole, probation, pardon, clemency, civil, tax court, court of claims, administrative or other dispute with the government or with any other authority or with any other parties; criminal, civil or tax immunity grants; relief from forfeiture; payments of money, rewards or fees, witness fees and special witness fees, provision of food, clothing, shelter, transportation, legal services or other benefits; placement in a "witness protection program" informer status of the witness; and anything else which arguably could reveal an interest, motive or bias in the witness in favor of the government or against the defense or act as an inducement to testify or to color testimony.

WHEREFORE, the Defendant prays that this motion be granted.

This 6th day of July, 2018.

s/William J. Sussman
ATTORNEY FOR DEFENDANT
347 GREENE STREET
AUGUSTA, GEORGIA 30901-2497
(706) 724-3331
STATE BAR NO: 693000

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document has been served on Trisha Rhodes Greenwood, U.S. Attorney's Office, P.O. Box 2017, Augusta, GA 30903 by electronic filing.

This 6th day of July, 2018.

s/William J. Sussman

ATTORNEY FOR DEFENDANT
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